

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LP MATTHEWS, L.L.C.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-1507 (SLR)
)	JURY TRIAL DEMANDED
BATH & BODY WORKS, INC.,)	
and)	
LIMITED BRANDS, INC.,)	
and)	
KAO BRANDS CO. (f/k/a THE ANDREW)	
JERGENS COMPANY),)	
and)	
KAO CORPORATION,)	
)	
Defendants.)	

**DEFENDANTS BATH & BODY WORKS, INC. AND LIMITED BRANDS, INC.'S
MOTION FOR SUMMARY JUDGMENT OF INVALIDITY UNDER 35 U.S.C. § 102**

Defendants Bath & Body Works, Inc. and Limited Brands, Inc. (collectively referred to as the “Limited Defendants”) hereby move for summary judgment of invalidity of United States Patent No. 5,063,062 under 35 U.S.C. § 102 for the reasons set forth in the Opening Brief and Declaration filed in support of the motion.

FOX ROTHSCHILD LLP

Dated: July 6, 2006

By: /s/ Francis G.X. Pileggi
 Francis G.X. Pileggi (Del. Bar No. 2624)
 Sheldon K. Rennie (Del. Bar No. 3772)
 FOX ROTHSCHILD LLP
 Suite 1300
 919 North Market Street
 Wilmington, Delaware 19801
 Phone: (302) 655-3667
 Fax: (302) 656-8920
 E-mail: fpileggi@foxrothschild.com
 E-mail: srennie@foxrothschild.com

OF COUNSEL:

John F. Ward
David M. Hill
Michael J. Zinna
WARD & OLIVO
708 Third Avenue
New York, New York 10017
Phone: (212) 697-6262
Fax: (212) 972-5866
E-mail: wardj@wardolivo.com
E-mail: hilld@wardolivo.com
E-mail: zinnam@wardolivo.com

Attorneys for Defendants
Bath & Body Works, Inc.
Limited Brands, Inc.